James L. Ahlstrom (8704) Kara M. Houck (8815) Austin D. Bybee (17956) PARR BROWN GEE & LOVELESS, P.C. 101 South 200 East, Suite 700 Salt Lake City, Utah 84111-3105 Telephone: (801) 532-7840 jahlstrom@parrbrown.com khouck@parrbrown.com

Attorneys for Defendants Soar Energy, Inc., Brian Decker, Cory Decker and Michael Machino

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

WOLVES VENTURES, LLC, a Utah limited liability company, AVEYO DIRECT, LLC, a Utah limited liability company, and INSIGHT CONSULTING, LLC, a Utah limited liability company on behalf of themselves and derivatively on behalf of AVEYO SOARS, LLC, a Utah limited liability company,

Plaintiffs,

v.

SOAR ENERGY, INC., a California corporation, BRIAN DECKER, individually, CORY DECKER, individually, and MICHAEL MACHINO, individually,

Defendants.

AMENDED STIPULATION AND JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANTS BRIAN DECKER AND MICHAEL MACHINO TO **RESPOND TO PLAINTIFFS' COMPLAINT**

Case No. 2:25-cv-00339-AMA

Judge Ann Marie McIff Allen

Magistrate Judge Cecilia M. Romero

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendants, on the one hand, and Plaintiffs, on the other hand, through their respective counsel of record, hereby stipulate and jointly move the Court to extend the due date through and including May 14, 2025, for Brian Decker ("Brian") and Michael Machino ("Machino") to file a response to Plaintiffs' Complaint [Dkt. 1]. Defendants filed a Stipulation and Joint Motion for Extension of Time for Defendants Brian Decker and Michael Machino to Respond to Plaintiffs' Complaint [Dkt. 16] on May 6, 2025, which inadvertently contained a typo and referred to an extension through "March 14, 2025" instead of "May 14, 2025." Defendants also submitted an Order Granting Stipulation and Joint Motion for Extension of Time for Defendants Brian Decker and Michael Machino to Respond to Plaintiffs' Complaint [Exhibit A to Dkt. 16] on May 6, 2025 with the same mis-typed date – "March 14, 2025" instead of "May 14, 2025," which the Court signed on May 7, 2025 [Dkt. 17]. Defendants file this Amended Stipulation and Joint Motion for Extension of Time for Defendants Brian Decker and Michael Machino to Respond to Plaintiffs' Complaint with an amended order attached as Exhibit A to fix the typo from March 14, 2025 to May 14, 2025. As good cause for the requested extension, counsel for the parties have been discussing the removal and venue for the claims. Accordingly, the Parties respectfully request that the Court enter an order extending the time for Defendants to respond to the Complaint through and including May 14, 2025.

A proposed order is attached hereto as **Exhibit A**.

Respectfully submitted this 7th day of May 2025.

PARR BROWN GEE & LOVELESS, P.C.

By: /s/Kara M. Houck

James L. Ahlstrom Kara M. Houck Austin D. Bybee Attorneys for Defendants

KUNZLER BEAN & ADAMSON

By: /s/ Chad S. Pehrson*

Chad S. Pehrson Attorneys for Plaintiffs *Electronically signed with permission

via email

2 4898-2075-9104

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 7th day of May 2025, a true and correct copy of the foregoing AMENDED STIPULATION AND JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANTS BRIAN DECKER AND MICHAEL MACHINO TO RESPOND TO PLAINTIFFS' COMPLAINT was filed with the Clerk of the Court using the CM/ECT system and sent to the following via email:

Chad S. Pehrson (cpehrson@kba.law) Alexis Nelson (anelson@kba.law) KUNZLER BEAN & ADAMSON 50 West Broadway, Suite 1000 Salt Lake City, Utah 84101 Attorneys for Plaintiffs

/s/ Lori J. Stumpf
Legal Assistant

4898-2075-9104